

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Application of Qwest Communications)
International, Inc. For Authorization to Provide) WC Docket No. 02-314
In-Region, InterLATA Service in the States)
of Colorado, Idaho, Iowa, Montana, Nebraska,)
North Dakota, Utah, Washington and Wyoming)

DECLARATION OF ROGER ROMERO

I, Roger Romero, being first duly sworn, do hereby declare as follows:

1. I am the Data Processing Manager for Ronan Telephone Company (RTC), and am responsible for the administration and processing of all calling records, as well as all data processing programming for Ronan Telephone Company. I am the custodian of the computer calling records for RTC.

2. I have conducted an analysis of calling records for traffic that was terminated by RTC from the Qwest "Feature Group D SS7 trunk group" which delivers calls from the Qwest IntraLATA network to the Ronan tandem central office switch. The information I analyzed was derived from two sources: 1) call records recorded by RTC for access billing purposes at the Ronan tandem switch; and 2) call record data recorded by and processed by Qwest that is sent to RTC by Qwest via Qwest's "COMET" system, which is also used in the Carrier access billing process.

3. My analysis of the data recorded by RTC revealed that Qwest transmitted 49,684 calls to RTC between June 16, 2002 and December 20, 2002 for termination to RTC to end users in the communities of Ronan, Pablo and Hot Springs (all in Montana) which originated outside of Montana and within the 14 state Qwest incumbent ILEC region (ie. InterLATA in-Region traffic). Additional analysis I conducted of call data supplied by Qwest via their COMET system for this traffic revealed that 17,334 of these calls completed between August 14 and December 13, 2002 were identified as being carried by Carrier Code 0432, which is reserved by Qwest.

4. Provided with this Declaration, is a computer file (in ASCII format) containing detailed call record information for each call which I believe was: 1) carried by Carrier 0432; 2) originated within Qwest's 14 state incumbent ILEC region outside of the Western Montana LATA; and 3) terminated to end users in Ronan, Pablo or Hot Springs, Montana. This includes a

total of 17,334 interLATA calls made during the time period between August 14, 2002, and December 13, 2002 which originate and terminate within the Qwest 14 state region and carried by Qwest's Carrier 0432. The data source for the calls included in the computer file was the Qwest COMET system. My conclusions are based upon the NPA and NXX of the originating telephone numbers and the terminating telephone numbers, both as recorded by RTC and as confirmed by the COMET data sent to RTC by Qwest.

DATED: December 20, 2002

Subscribed and Sworn to this 20th day of December, 2002

_____/s/_____
Roger Romero Date

State of Montana County of Lake

Subscribe and sworn before me this 20th day of December, 2002
by

_____/s/_____
Cheryl A. Hackman

Notary Public _____

My Commission expires: _____